

Thomas J. Kavaler  
David N. Kelley  
CAHILL GORDON & REINDEL LLP  
80 Pine Street, New York, New York  
Telephone: (212) 701-3000

*Attorneys for Plaintiffs ABN AMRO Mortgage Group, Inc.*

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

ABN AMRO MORTGAGE GROUP, INC.,

Plaintiff,

*- against -*

NATIONAL SETTLEMENT AGENCY, INC.,  
STEVEN M. LEFF, RACHEL M. LEFF AND  
RICHARD A. LEFF,

Defendants.

Case No. 07-CIV-7657

**MOTION FOR A DEFAULT  
JUDGMENT AS AGAINST  
DEFENDANTS NATIONAL  
SETTLEMENT AGENCY, INC.  
AND STEVEN M. LEFF**

PLEASE TAKE NOTICE that upon the declaration of Thomas J. Kavaler and the accompanying memorandum of law, Plaintiff ABN AMRO Mortgage Group, Inc. ("AAMG") will move this Court at a date and time to be set by the Court for a judgment by default against National Settlement Agency and Steven M. Leff. The Summons and Complaint and the Amended Complaint were served on Defendants National Settlement Agency, Inc. ("NSA") and Steven M. Leff on September 13, 2007. No answer or other defense has been filed by the Defendant. A certificate of default against Defendants NSA and Steven M. Leff was signed by the clerk of this court on October 12, 2007. No proceedings related to that default have been taken by either Defendant NSA or Defendant Steven M. Leff since default was entered.

- 2 -

Wherefore, Plaintiff moves that this Court make and enter a judgment against Defendants NSA and Steven M. Leff as follows:

1. On the First Claim for Relief (Breach of Contract), judgment against defendant NSA in the amount of \$2,261,744.10.
2. On the Second Claim for Relief (Conversion) judgment against Defendants NSA and Steven M. Leff, jointly and severally, in the amount of \$2,261,744.10.
3. On the Third Claim for Relief (Fraud), judgment against Defendants NSA and Steven M. Leff, jointly and severally, in the amount of \$2,261,744.10.
4. On the Fourth Claim for Relief (Breach of Fiduciary Duty), judgment against Defendants NSA and Steven M. Leff, jointly and severally, in the amount of \$2,261,744.10.
5. On the Fifth Claim for Relief (Negligence), judgment against Defendants NSA and Steven M. Leff, jointly and severally, in the amount of \$2,261,744.10.
6. On the Seventh Claim for Relief (Unjust Enrichment), judgment against Defendants NSA and Steven M. Leff, jointly and severally, in the amount of \$2,261,744.10.
7. On the Eighth Claim for Relief (Money Had and Received), judgment against Defendants NSA and Steven M. Leff, jointly and severally, in the amount of \$2,261,744.10.

- 3 -

8. Any other relief that this Court deems just and proper, together with the costs, disbursements, and attorney's fees incurred in this action.

Dated: New York, New York  
October 12, 2007

By:



Thomas J. Kavalier  
David N. Kelley  
CAHILL GORDON & REINDEL LLP  
80 Pine Street  
New York, New York 10005

To: National Settlement Agency, Inc.  
c/o Steven M. Leff  
c/o Michael L. Soshnick, Esq.  
190 Willis Avenue, Suite 112  
Mineola, New York 11501

Michael L. Soshnick, Esq.  
190 Willis Avenue, Suite 112  
Mineola, New York 11501

*Attorneys for Defendant Steven M. Leff*

Lawrence Morrison, Esq.  
220 East 72nd Street, 25th Floor  
New York, New York 10021

*Attorney for Defendant Rachel M. Leff*

Michael Neri, Esq.  
Kaufman Borgeest & Ryan LLP  
9 Park Avenue-19th Fl  
New York, NY 10016

*Attorney for Defendant Richard A. Leff*